

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>PATRICIA JO CALHOUN</b>	:	<b>CASE NO. 1:21-bk-02637-HWV</b>
<b>aka PAMELA J. CALHOUN</b>	:	
<b>aka PAM J. CALHOUN</b>	:	<b>CHAPTER 13</b>
<b>Debtor</b>	:	
	:	
<b>MIDFIRST BANK</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>PATRICIA JO CALHOUN</b>	:	
<b>aka PAMELA J. CALHOUN</b>	:	
<b>aka PAM J. CALHOUN</b>	:	
<b>Respondent</b>	:	

**DEBTOR'S RESPONSE TO MOTION OF  
MIDFIRST BANK  
FOR RELIEF FROM THE AUTOMATIC STAY**

**AND NOW**, comes Debtor, Patricia Jo Calhoun, by and through her attorney, Gary J.

Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Strict proof is demanded.
5. Admitted.
6. Admitted in part and denied in part. The exact amount of the arrearage is unknown.

Strict proof is demanded.

7. Admitted in part and denied in part. See response to paragraph 6.

8. Denied. The property is worth \$130,000.00 according to the market analysis attached to Debtor's Schedules. The amount owed to Movant according to its Amended Proof of Claim is \$64,847.55. Accordingly, there is abundant non-exempt equity providing adequate protection to Movant. Further, several of Debtor's payments were rejected by Midfirst and sent back to Debtor without explanation. Debtor will make an offer in the near future to bring the payments current.

9. Admitted.

10. Admitted in part and denied in part. Strict proof is demanded as to any fees and costs incurred.

11. Denied. Any fees and costs incurred should be approved or denied as part of this Motion for Relief.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum  
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DATED: 5/20/24

**CERTIFICATION OF SERVICE**

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF MIDFIRST BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE  
CHAPTER 13 TRUSTEE  
VIA E-SERVICE

MICHAEL P. FARRINGTON, ESQUIRE  
KML LAW GROUP, P.C.  
COUNSEL FOR MOVANT  
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

*Carol V. Shay*

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DATED: 5/20/2024